

# COHEN & GREEN

April 21, 2023

Hon. Gabriel W. Gorenstein, U.S.M.J.  
United States District Court, Southern District of New York  
Daniel Patrick Moynihan Courthouse, 500 Pearl Street  
New York, New York 10007

By Electronic Filing.

**Re: In re: New York City Policing During Summer 2020 Demonstrations,  
1:20-CV-8924 (CM) (GWG) — This Letter Relates to All Cases**

Dear Judge Gorenstein:

I write on behalf of the non-stayed Plaintiffs, jointly with the non-union Defendants (e.g., the Defendants represented by the City Law Department).

As the Court permitted in Dkt. No. 930, the parties have agreed to extend the deadline for the first round of simultaneous, supplemental briefing on the Hart/Chernyavsky depositions. While both sides offered some availability for Sgt. Rice's deposition before May 17, that availability did not match. Thus, the deposition will proceed on May 17, and we ask the Court to set May 24 for the first round of letters and June 1 for the second.

As always, we thank the Court for its continued time and attention.

Respectfully submitted,

/s/

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J. Remy Green

*Honorific/Pronouns: Mx., they/their/them*

**COHEN & GREEN P.L.L.C.**

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Enclosure.

cc:

All relevant parties by electronic filing.